

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA

v.

BRIAN CARPENTER

§
§
§
§
§

DOCKET NO. 3:19-CR-00452-X

**MOTION FOR DISCLOSURE REGARDING THE GOVERNMENT’S “FILTER TEAM”
AND THIRD PARTY VENDORS INVOLVED IN DISCOVERY REVIEW AND
PRODUCTION**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the Defendant, Brian Carpenter, by and through his counsel of record, and respectfully moves that the Court order the Government to disclose the following information regarding its “filter team” (those charged with review of documents to determine if they are privileged) and third party vendors involved in discovery review:

1. The date on which the “filter team” was formed.
2. A list of all individuals on the filter team, including their titles and employers.
3. Who specifically selected and appointed the various individuals on the filter team.
4. Whether any of the materials seized in the search or provided to the defense in the discovery process have ever been in the possession of any non-government third party vendor(s), and if so, whom.

WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully requests that the Court order the Government to provide the information requested herein no later than thirty days prior to trial.

Respectfully submitted,

/s/ Daniel K. Hagood, P.C.

DANIEL K. HAGOOD, P.C.

Texas Bar No. 08698300
2515 McKinney Avenue
Chateau Plaza, Suite 940
Dallas, Texas 75201
214.720.4040 telephone
214.237.0905 facsimile
dhagood@sorrelshagood.com

ROBERT T. JARVIS

Texas Bar No. 10586500
Jarvis & Hamilton Law Firm
123 West Houston Street
Sherman, TX 75090
903-892-8500 telephone
903-892-8550 facsimile
bob@jarvishamilton.com

ALEXANDRA HUNT

Texas Bar No. 24095711
2515 McKinney Avenue
Chateau Plaza, Suite 940
Dallas, Texas 75201
214.720.4040 telephone
214.237.0905 facsimile
ahunt@sorrelshagood.com

COUNSEL FOR DEFENDANT CARPENTER

CERTIFICATE OF CONFERENCE

I hereby certify that I have attempted to confer with USDOJ Trial Attorney Brynn Schiess regarding the foregoing motion, but have not yet been able to do so. Accordingly, the foregoing motion is submitted on the presumption that she is opposed to the filing of same. I further certify that I have conferred with counsel of record for Defendant Hawrylak regarding the foregoing motion and that he is unopposed to the filing of same.

/s/ Daniel K. Hagood
DANIEL K. HAGOOD, P.C.

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of December, 2019, a true and correct copy of the foregoing motion was filed with the Clerk of the Court for the United States District Court, Northern District of Texas using the electronic case filing system, which provides for service upon all counsel of record.

/s/ Daniel K. Hagood
DANIEL K. HAGOOD, P.C.